

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	
v.	)	
	)	Crim. No. 17-201-01 (ABJ)
PAUL J. MANAFORT, JR.,	)	
	)	
Defendant.	)	

**DEFENDANT PAUL J. MANAFORT, JR.'S RESPONSE TO THE SPECIAL  
COUNSEL'S NOTICE OF INTENT TO INTRODUCE OTHER ACTS EVIDENCE**

Paul J. Manafort, Jr., by and through counsel, hereby submits his response to the Special Counsel's notice of intent to introduce other acts evidence (Doc. 327). Based on the Special Counsel's limited representations concerning the three subjects of potential other acts evidence (*see id.*, at 2-3, advising that the Special Counsel may seek to introduce evidence concerning the Ukrainian procurement process, representations to the IRS and a mortgage lender, and/or Cypriot loans), together with our limited understanding of the types of proof the Special Counsel will offer in connection with these possible subjects, Mr. Manafort reserves for trial all appropriate objections to evidence offered by the Special Counsel and respectfully submits that any objections related to the subjects identified in the Special Counsel's notice will be manageable for the Court during the course of the trial.

Dated: June 29, 2018

Respectfully submitted,

/s/

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